



IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

MICHAEL COREY JENKINS, et al.,

Plaintiffs,

Civil Action

vs.

No. 3:23-cv-374-DPJ-FKB

RANKIN COUNTY, MISSISSIPPI, et al.,

Defendants.



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98 to 101

1 response when you read the New York Times article on  
2 the Rankin County deputies and the Goon Squad?  
3  
4 MR. DARE: Same objection. You can  
5 answer.

6 THE DEPONENT: I can answer? I was  
7 devastated.

8 BY MR. SHABAZZ:

9 Q. Okay. And why was that?

10 A. I'm 71. I was 69 and 70 during that time.  
11 Opdyke, Edward and a couple of those kids were young  
12 enough to be my children. I trusted them, I loved  
13 them and they just broke my heart.

14 Q. Okay. Well I mean -- were you shocked  
15 that all of this could have been occurring while you  
16 were in supervisory position in the department?

17 A. Again, I didn't supervise them on the  
18 shift. Only on SRT operations. But it just was  
19 terrible.

20 Q. Okay. But were you surprised this had  
21 been occurring in the Rankin Sheriff's Department?

22 MR. DARE: Object to form.

23 THE DEPONENT: I don't know how you  
24 couldn't be that.

25 THE REPORTER: Will you repeat your  
answer?

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1 that he does not have to provide any opinions if he  
2 does not so choose. I would also note that counsel  
3 knows that this is not an expert deposition.

4 MR. SHABAZZ: I can ask about the article.  
5 BY MR. SHABAZZ:

6 Q. Okay. So you said you were surprised?  
7 A. Absolutely.

8 Q. Okay and --

9 A. Disappointed's more the proper word,  
10 probably.

11 Q. Why was that?

12 A. I was disappointed in them. You just  
13 don't do those things.

14 Q. Okay. Now were you surprised that -- well  
15 first of all, were you -- were you -- in the New  
16 York Times article, were you aware of any of the  
17 allegations that came out in that article?

18 A. Yeah. What? I don't understand what  
19 you're asking now.

20 Q. Outside of Michael Jenkins and Eddie  
21 Parker, that article named a number of incidents  
22 that have been alleged against Rankin County  
23 deputies over the years.

24 A. I'm not -- I'm not personally familiar  
25 with them. I mean in the line of work we're in, you

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1 get a lot of allegations. Most people who end up  
2 going to jail have an allegation of innocence.

3 Q. Right. But these were allegations of  
4 torture and abuse by Rankin deputies?

5 A. I don't remember any torture and abuse  
6 allegations.

7 Q. Do you remember that in the article?

8 A. Basically, yes I read it.

9 Q. Okay. So you -- even in the article,  
10 there were -- there were many things alleged against  
11 the deputies that are similar to what in the Jenkins  
12 and Parker?

13 MR. DARE: Object to form.

14 BY MR. SHABAZZ:

15 Q. I mean, did you read that?

16 A. I read the article, sir. Third time I've  
17 answered it.

18 Q. Okay, and when you looked back at your  
19 position in the department, how do you -- how do you  
20 -- did you ask yourself how did I miss all of this  
21 while I was in the department?

22 MR. DARE: Object to form. Same  
23 objection. Go ahead. I mean if you can answer, you  
24 can answer. Again, doesn't have to provide any  
25 opinions.

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102 to 105

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1 MR. SHABAZZ: Okay.  
2 BY MR. SHABAZZ:  
3 Q. When you read that article, when you read  
4 that, did you look back and assess your own job  
5 performance?  
6 A. No, no. These guys knew what -- no.  
7 These guys what -- these guys knew what they did was  
8 wrong.  
9 Q. Okay. But how come you didn't find out?  
10 A. Because I didn't follow them around at  
11 night. Was not my job. I trusted these kids.  
12 Q. Okay. Did you supervise them properly?  
13 A. I was not their supervisor. Only on SRT  
14 operations did I manage them.  
15 Q. Okay. Did the Rankin County Sheriff's  
16 Department supervise them properly?  
17 MR. DARE: Object to form again. I think  
18 he's answered as to the facts as he knows them.  
19 MR. SHABAZZ: I got that. Objection  
20 noted. Did the Rankin County Sheriff's Department  
21 properly supervise these deputies?  
22 MR. DARE: And again, that's an opinion  
23 question that I -- I'm not going to instruct the  
24 witness not to answer, but he's not required to.  
25 BY MR. SHABAZZ:

1 in that article, how could those deputies have  
2 gotten away with what they got away with in that  
3 department?  
4 A. Sounds like they didn't get away with  
5 anything, I don't think.  
6 Q. Okay. But what about all the -- what  
7 about the numerous other allegations in that  
8 article?  
9 MR. DARE: That's not a question.  
10 THE DEPONENT: I'm not familiar with them.  
11 BY MR. SHABAZZ:  
12 Q. But you read the article, right?  
13 A. Fourth time, yes.  
14 Q. Okay. So I mean this is a simple  
15 question. I mean a simple question.  
16 A. I'm not familiar with the individual  
17 incidents. I cannot put a lot of stock in many  
18 allegations made against law enforcement in general.  
19 I was in law enforcement for 48 years. A lot of  
20 allegations.  
21 As you know as a defense counsel, one of  
22 the first things you do is take focus off of the  
23 defendant and put it on the law enforcement. So I'm  
24 a cop. I'm sorry.  
25 Q. Okay. So you said you don't take a lot of

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1 Q. Sir, you have to answer the question sir.  
2 A. Ask the question.  
3 Q. Did the Rankin County Sheriff's Department  
4 properly supervise the deputies that you read about,  
5 that committed these alleged actions in that New  
6 York Times article that you read?  
7 MR. DARE: All right. So he can answer  
8 the question whether he did. You're asking him his  
9 opinion on whether Rankin County did anything else,  
10 even though he may not have knowledge of what's --  
11 other supervision. And that is why I'm repeatedly  
12 objecting here, because I don't think your question  
13 is proper. But again, I'm going to let -- I'm not --  
14 - I'm going to let him answer the question, even  
15 though it is improper and based off of hearsay.  
16 MR. SHABAZZ: I got you.  
17 BY MR. SHABAZZ:  
18 Q. Go right ahead, sir.  
19 A. I don't know.  
20 Q. I believe you do know. You were working  
21 there.  
22 MR. DARE: Asked and answered,  
23 argumentative. You don't have to answer again.  
24 BY MR. SHABAZZ:  
25 Q. How could -- if those allegations are true

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1 stock in allegations against police officers? Is  
2 that what you said?  
3 A. They're always to me require further  
4 investigation.  
5 Q. Okay. All right. So the people that I'm  
6 talking about are in that article. That's why I  
7 asked, because when you said --  
8 A. Again, I don't know the specifics of each  
9 -- I have no knowledge of what happened, what the  
10 investigations found. It's the New York Times,  
11 boss.  
12 Q. I mean I understand that. But I just want  
13 to know were they part of these ten investigations?  
14 A. No. I've answered that at least a dozen  
15 times. No. I had no personal knowledge, nor did I  
16 investigate these incidents.  
17 Q. Well, you say you've investigated ten.  
18 You investigated ten.  
19 A. I said "maybe."  
20 Q. You say you can't even name the ten.  
21 A. Give me details.  
22 Q. I'm talking about which ten.  
23 MR. DARE: And I think he's answered the  
24 question to the best of your ability. He has  
25 answered the question now, I can't even tell you how

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106 to 109

<p>1 many times.</p> <p>2 BY MR. SHABAZZ:</p> <p>3 Q. Well, sir. Let me just go down -- let me 4 just go down individual things, okay? Let me just 5 name -- let me just get an answer on the names, and 6 then --</p> <p>7 A. Haven't we done this once?</p> <p>8 Q. No, we haven't. We have -- this is -- 9 we've only gotten part way through it.</p> <p>10 MR. DARE: That's with the civil lawsuits.</p> <p>11 THE DEPONENT: Oh, okay.</p> <p>12 MR. SHABAZZ: I've gotten part way through 13 it. Okay. I just need to know, because I need to 14 know whether these were your investigations. Okay, 15 so I'm going to -- and they were in the article. 16 Okay so, Christopher Hopkins.</p> <p>17 THE DEPONENT: I don't have a copy.</p> <p>18 MR. DARE: Do you have a copy of the 19 article?</p> <p>20 MR. SHABAZZ: I don't -- I don't know if I 21 need to belabor it. I mean I just want to know if 22 he's familiar with it.</p> <p>23 THE DEPONENT: You're doing a pretty good 24 job of it, sir.</p> <p>25 MR. DARE: Don't get into the back and</p>	Page 106	<p>1 going to -- you take the deposition the way that you 2 want to take the deposition. But he did answer 3 before. None of the facts from the New York -- or 4 none of the allegations in the New York Times 5 article were familiar to him prior to reading the 6 article. And so I think that has generally been 7 answered.</p> <p>8 MR. SHABAZZ: All right. Well --</p> <p>9 MR. DARE: But and if you want to go 10 through every last one of them and go through the 11 facts in every last one of them, feel free.</p> <p>12 BY MR. SHABAZZ:</p> <p>13 Q. Are you familiar with Robert Jones, the 14 allegations made against the Rankin County Sheriff's 15 Department that was contained in that article you 16 read?</p> <p>17 A. No. Not just based on a name, no.</p> <p>18 Q. Okay. Are you familiar with Fred Trimble, 19 who was in that article, who makes allegations 20 against Rankin County deputies?</p> <p>21 MR. DARE: Can you spell the last name?</p> <p>22 MR. WALKER: T-R-I-M-B-L-E.</p> <p>23 MR. SHABAZZ: Trimble, T-R-I-M-B-L-E.</p> <p>24 BY MR. SHABAZZ:</p> <p>25 Q. And he makes allegations that he was</p>	Page 108
<p>1 forth with him. Let's allow me to do that.</p> <p>2 BY MR. SHABAZZ:</p> <p>3 Q. All right. Just let me give you the name.</p> <p>4 If it's no, it's no. If it's no, it's no. I'm not 5 going to belabor this deposition without describing 6 all of these incidents.</p> <p>7 A. Sir, that's about the only way I can 8 remember them. But go ahead.</p> <p>9 Q. All right. If you insist, okay. Okay.</p> <p>10 MR. SHABAZZ: Trent Walker, can you do me 11 a favor? While I'm asking some other questions, can 12 you print out the New York Times article?</p> <p>13 MR. WALKER: Not where I am.</p> <p>14 MR. SHABAZZ: Can you just email it to 15 Jason there right now, and we just print it out?</p> <p>16 MR. DARE: And we're going to read the 17 entire article again, and then go through that?</p> <p>18 MR. SHABAZZ: I'm not trying to do that. 19 I'm trying to ask him, if you'll let me. Which I'm 20 going to do it anyway, ask you about the names and 21 if you don't -- you're not familiar, you're not 22 familiar.</p> <p>23 THE DEPONENT: Go ahead.</p> <p>24 MR. DARE: Well, you know, and I think he 25 answered the question before, and certainly I'm</p>	Page 107	<p>1 abused Rankin deputies in July of 2018?</p> <p>2 A. No.</p> <p>3 Q. Okay. In June of 2018, Jerry Manning, M- 4 A-N-N-I-N-G, Elbert Lynch, L-Y-N-C-H, Gary Curro, C- 5 U-R-R-O and Adam Porter made allegations -- in that 6 article made allegations that they were abused by 7 Rankin County deputies in June of 2018?</p> <p>8 A. Based on name alone, no.</p> <p>9 Q. Okay. In that entire article, was there 10 anybody -- anything you read, were they part of any 11 of your investigations?</p> <p>12 A. No. That's the best of my recollection.</p> <p>13 Q. Okay. And does that include Carvis 14 Johnson, Carvis Johnson?</p> <p>15 A. Not based on a name, sir.</p> <p>16 Q. So could a Barry Yawn?</p> <p>17 A. Nope.</p> <p>18 Q. Mitchell Hobson?</p> <p>19 A. Nope.</p> <p>20 Q. Rick Loveday?</p> <p>21 A. Nope.</p> <p>22 Q. Robert Grozer, G-R-O-Z-E-R?</p> <p>23 A. No. Nope.</p> <p>24 Q. Maurice Porter?</p> <p>25 A. No.</p>	Page 109

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110 to 113

<p>1       Q.    Okay. Jacoby Hopkins (phonetic)?  2       A.    No.  3       Q.    Okay. Did you ever have a chance to  4   investigate Deputy Luke Stickman for any allegations  5   of abuse?  6       A.    Not to my recollection.  7       Q.    Are you sure on Luke Stickman?  8       A.    Did I personally investigate Stickman?  9       Q.    Was he one of the ten cases you  10   investigated?  11      A.    Not to the best of my knowledge.  12      Q.    Okay. What about Deputy James Rayborn  13   (phonetic)? Are you familiar with him?  14      A.    Uh-huh.  15      MR. DARE: You've got to answer yes or no.  16      THE DEPONENT: Yes, yes.  17   BY MR. SHABAZZ:  18      Q.    Rayborn. And did you ever have a chance  19   to investigate him as one of your --  20      A.    One occasion. One occasion.  21      Q.    Okay. Could you tell me about that?  22      A.    That was an internal personnel matter  23   involving some inappropriate comments he made in  24   front of a dispatcher.  25      Q.    Okay. Could you tell me what happened?</p>	Page 110	Page 112
<p>1       A.    He was removed from the position and given  2   -- given another one.  3       Q.    What did he say?  4       MR. DARE: If you recall.  5   BY MR. SHABAZZ:  6       Q.    What did he speak?  7       A.    Something along the lines in front of a  8   female. Something of a sexual nature.  9       Q.    Okay. I mean and when you investigated  10   him, what happened?  11      A.    He was removed from the position.  12      Q.    And was this the result of your making a  13   finding in your investigation?  14      A.    I don't make findings, sir. I just  15   present the facts. The Sheriff makes the findings.  16      Q.    Okay. So you -- the Sheriff removed him  17   in this -- from his position, based on your  18   investigation?  19      A.    I assume so.  20      Q.    Okay. What about Cody Grogan?  21      A.    I did not do any investigations against --  22   to my knowledge with Cody.  23      Q.    What about Deputy Kevin Poole?  24      A.    No. Poole left shortly after I started.  25   Then he came back for a short period of time, maybe</p>	Page 111	Page 113

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114 to 117

1	Q. Anyone else?	Page 114	1	A. Not to my recollection.	Page 116
2	A. No. That would just be speculation on my part.		2	Q. Okay. And in terms of a citizen being able to make a complaint against Rankin County Sheriff's Department, what do you know about that procedure?	
3			3		
4	Q. Okay. Did the Department of Justice --		4		
5	did the Department of Justice interview you in		5		
6	regards to the operations of the Rankin County		6		
7	Sheriff's Department?		7		
8	A. This is the first deposition or interview		8		
9	I have been involved in concerning the Rankin County		9		
10	Sheriff's Office.		10		
11	Q. Okay. Now in January 2023, you were --		11		
12	you said you were over training. Does that mean you were over the Training Division?		12	Q. Okay. So you're saying that these complaints were taken orally?	
13			13		
14	A. There is no division, sir. It was me.		14	A. Some.	
15	Q. Okay. So you were the one man in charge of all training?		15	Q. Okay. And the ones that were not taken orally, what was the procedure?	
16			16		
17	A. Again, I maintained the records.		17	A. That I'm not familiar with a written protocol or written procedure of how to handle complaints against the Sheriff's Office.	
18	Q. You maintained the records. Now in terms of the -- I just want to get clear. In terms of excessive force, was there a specific training mandate for the deputies to be trained on -- on the proper use of force?		19		
19			20	Q. So are you saying that Rankin County did not have a written procedure for filing citizen complaints?	
20			21		
21			22		
22	A. We asked them to take a couple of course on Virtual Academy, and I don't remember any one particularly named excessive force. But there were		23	A. No, sir. I said I was not familiar with one.	
23			24		
24			25	Q. Okay. You're not familiar -- you're not	
25					
1	some involving civil rights and stuff along those lines.	Page 115	1	familiar with one?	Page 117
2			2	A. That's what I said, yes sir.	
3	Q. Did you -- you asked them to take this course?		3	Q. Did the department have one?	
4			4	A. If I'm not familiar with one, how can I attempt to find that, sir? I don't -- again, I am not familiar with one.	
5	A. They were assigned to take the course, yes sir.		5		
6			6		
7	Q. Every deputy?		7	Q. Okay. But I mean you would be familiar if they had one; correct?	
8	A. Yes, sir.		8		
9	Q. Okay. What was that training about?		9	A. Not necessarily.	
10	A. I'm sorry. What was that?		10	Q. And I'm trying to get clear. Now you said the other training you mentioned was a civil rights training? It had a civil rights aspect to it?	
11	Q. What was the name of that training you were --		11		
12			12		
13	A. I can't -- I can't recall the specific name of it right now. I have to look at the Virtual Academy roll sheet.		13	A. Yeah.	
14			14	Q. Okay. Could you explain that training?	
15			15	A. I didn't attend it.	
16	Q. And what was the --		16	Q. Do you know what it was about and what it consisted of?	
17	A. They should be able to provide that. They should be able to provide that to you.		17		
18			18	A. Jeff Artis -- Jeff Artis, a retired FBI agent, I'm pretty sure you're probably familiar with him, did a Color of Law school or class a couple of days long.	
19	Q. Okay. What was the description? Help me out with the description of the training.		19		
20			20		
21	A. Sir, I don't remember. That's four years ago, close to four years ago, three years ago.		21		
22			22	Q. When was -- when did that take place?	
23	Q. Okay. Other than that, any other specific trainings that were -- that were mandated by Rankin		23	A. I don't -- I don't remember.	
24	County that deal with the use of force?		24	Q. I mean was it before the Jenkins and Parker incident?	
25			25		

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118 to 121

<p>1 A. I think so. I know he provided some 2 training afterwards also, but I was not there for 3 that.</p> <p>4 Q. You say "before." Do you know when about 5 he did that beforehand?</p> <p>6 A. No, sir.</p> <p>7 Q. Did it happen before?</p> <p>8 A. I think so.</p> <p>9 Q. But you're not sure?</p> <p>10 A. I'm not sure.</p> <p>11 Q. You have records? You have records?</p> <p>12 A. I do not. I do not. No, sir.</p> <p>13 Q. Okay. Let me ask you just in this -- I'm 14 trying to get a -- just a bare idea of the structure 15 of the department that you were a part of. If 16 someone issued a complaint, if somebody complained 17 about Christian Dedmon, somebody had complained at 18 Christian Dedmon, is it true that that complaint 19 would be passed on to Brett McAlpin?</p> <p>20 A. Probably. I would think so.</p> <p>21 Q. Okay. And what was Brett McAlpin's job?</p> <p>22 A. What was his what, sir?</p> <p>23 Q. Brett McAlpin's job, yes.</p> <p>24 A. He was the Chief Investigator at the time 25 of this incident.</p>	<p>Page 118</p> <p>1 reported directly to Bryan Bailey?</p> <p>2 A. Oh, yes sir, and the Undersheriff, of 3 course.</p> <p>4 Q. Okay. And how did he report to them?</p> <p>5 A. I can't answer that.</p> <p>6 Q. Well, how do you know he reported to Bryan 7 Bailey?</p> <p>8 A. Because Bryan Bailey's the Sheriff.</p> <p>9 Q. But how do you know that happened?</p> <p>10 A. I don't. If you want to get specific, I 11 don't know. I've seen them conversation on many 12 occasions talking about cases.</p> <p>13 Q. Okay. Now was Brett McAlpin responsible 14 for training the investigators or just supervising 15 them? Did he conduct any training of investigators 16 or he just supervised them?</p> <p>17 A. Not to my knowledge.</p> <p>18 Q. Okay. All right. Give me one second. I 19 don't have too much more. And what changes did the 20 Rankin County Sheriff's Department implement after 21 Jenkins and Parker incident? What changes did the -- 22 -</p> <p>23 A. That's a little broad, sir. You might be 24 more specific than that. Yeah. I left in -- 25 actually I left --</p>
<p>1 Q. And what did that -- what did that mean? 2 What was the --</p> <p>3 A. He supervised investigators.</p> <p>4 Q. Okay. Could you give me further 5 description of how he -- how he supervised the 6 investigators?</p> <p>7 A. They had a meeting every day, passed out 8 their cases to be assigned. I guess he liaised 9 with any questions that might have come in about 10 investigations that the individual investigator 11 couldn't handle and --</p> <p>12 Q. Which investigators did he supervise?</p> <p>13 A. Sir?</p> <p>14 Q. Which investigators did Brett McAlpin 15 supervise?</p> <p>16 A. All of them.</p> <p>17 Q. Okay. When you say "all," can you tell me 18 who you mean?</p> <p>19 A. I don't have a list of employees there, 20 sir. And again that fluctuated --</p> <p>21 Q. Not their names. Not their names, but 22 their titles?</p> <p>23 A. Investigator.</p> <p>24 Q. Okay. So Brett McAlpin supervised all the 25 investigators. How often did Brett McAlpin, he</p>	<p>Page 119</p> <p>1 Q. What training -- I understand.</p> <p>2 A. Oh.</p> <p>3 Q. Okay. Between January of 2023 and when 4 you left in October, what specific changes did the 5 Rankin County Sheriff's Department make in terms of 6 its operations, as it pertains to civil rights?</p> <p>7 A. None to my knowledge. I don't -- I don't 8 really know how you would change your operating 9 procedures in relation to civil rights. I mean 10 civil rights are civil rights. You go by the law.</p> <p>11 Q. Okay. But something major occurred within 12 the department that --</p> <p>13 A. Very true.</p> <p>14 Q. Did Rankin make any changes? Did they 15 make any changes?</p> <p>16 A. No, not that I can think of.</p> <p>17 Q. Okay. Well, was the Internal Affairs 18 Department established after you left or before?</p> <p>19 A. Yeah. Right before I left, they had a new 20 investigator. He was -- an investigator from 21 another agency came, and they started assigning them 22 to him.</p> <p>23 Q. Was he in -- was that the beginning of the 24 Internal Affairs Department? I mean, pardon. Yes. 25 Was that the beginning of the Internal Affairs</p>

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122 to 125

1 Department of Rankin County?

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2 A. I don't know. I would guess it would be,  
3 but I don't know.4 Q. Okay. But that would be the first time  
5 that an IAD, Internal Affairs Department, had been  
6 established?7 A. Again, I don't know. I would assume so.  
8 Q. Okay. Do you know in January of 20239 about how many investigators were there in the  
10 Rankin Sheriff's Department? Do you know?11 A. Are you counting -- seven-eight maybe. I  
12 don't know. It depends on whether you --

13 Q. Okay.

14 A. That's just -- again, that's a WAG.

15 Q. Okay. And they were supervised by  
16 McAlpin?

17 A. At that time, yes sir.

18 Q. Okay. And they're classified -- those  
19 investigators are classified different than  
20 deputies, is that right?21 A. I don't understand that. Everybody's a  
22 deputy. Investigators are a title.23 Q. Okay. And everybody's a deputy and some  
24 are investigators? Okay.

25 A. Right. That's a title. That's a job

1 title.

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2 Q. Okay. One second.

3 A. Yes, sir.

4 Q. Do you know who was in -- whose  
5 responsibility it was to determine if taser use was  
6 a -- was justified in the Rankin County Sheriff's  
7 Department? Whose responsibility was that, to  
8 determine what the deputies' taser use was?9 A. You were -- to the best of my knowledge,  
10 because I'm not taser-certified or dealt with them,  
11 but if a deputy had a taser download, I'm sorry.12 The taser use, because you have downloads  
13 without usage, he would come in and tell -- there  
14 should be a use of force report. It came with a  
15 taser usage, and then it would go to the Chief of  
16 Patrol and they would download it, and then it would  
17 logged and attached to the use of force report.18 I didn't participate in this. I've  
19 witnessed them doing it, simply because their  
20 offices was right next to mine. But that was just  
21 kind of what I inferred.22 Q. Okay. So you say that the Chief of Patrol  
23 was -- was the person that would be responsible for  
24 collecting the taser use reports?

25 A. He would -- yes. There again, they would

1 -- he would do a download from their taser, attach  
2 the download data to the use of force report.3 Q. Okay. Who was responsible for determining  
4 -- determining whether those tasers had been used  
5 appropriately?6 A. I would assume it would be Chief of Patrol  
7 and in counsel with the Undersheriff and the  
8 Sheriff.9 Q. The Undersheriff and the Sheriff were  
10 responsible for determining whether that taser had  
11 been used correctly?12 A. Ultimately, it's always the Sheriff's  
13 decision. I don't really know who's included. I  
14 mean he may ask two or three people. I don't know.15 Q. But ultimately, that rests on the -- it  
16 comes to the Sheriff; correct?

17 A. He is the Sheriff.

18 Q. Ultimately then, the Sheriff would receive  
19 these taser reports?

20 A. I'm assuming.

21 Q. Okay. And what about firearm use? Whose  
22 responsibility was it to determine whether a firearm  
23 had been used appropriately?24 A. Again, that would additionally be the  
25 Sheriff.

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1 Q. Okay. Okay. So like for example in the  
2 case of Mr. Schmidt, where it's a fact that the  
3 firearm was discharged in the course of interactions  
4 with Mr. Allen Schmidt. Would Bryan Bailey be  
5 notified that that firearm had been used?

6 MR. DARE: Object to form.

7 THE DEPONENT: I don't --

8 MR. SHABAZZ: Would Bryan Bailey know that  
9 a deputy had used that -- discharged his firearm as  
10 in the case of Mr. Schmidt?11 MR. DARE: My objection was just that it  
12 was a fact that it had been discharged. But I mean  
13 if you know, you can answer.14 THE DEPONENT: From what I can deduct, I  
15 don't think it was ever reported as a discharge, was  
16 it?

17 BY MR. SHABAZZ:

18 Q. I'm asking you.

19 A. I'm telling you. I don't think it was  
20 ever reported.21 Q. Okay. Well, you say that all discharges  
22 are reported; correct?

23 A. They're supposed to be.

24 Q. Okay. Well, what is the system to -- to  
25 know whether or not a deputy has discharged their

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<p>1      <b>firearm? Is there a system in place?</b></p> <p>2      A. I don't know how you would do that, unless 3 you counted their ammo every day when they went on 4 shift, and counted it every day when they went off 5 shift, and then check their car and see if they had 6 extra ammo every day. You kind of have to trust 7 your people.</p> <p>8      Q. Okay. So what are you saying? You're 9 saying that -- what are you saying when you say 10 that?</p> <p>11     A. I don't -- I don't know if any department 12 that has the ability to do that.</p> <p>13     Q. Okay. But you said that -- did you say 14 that Sheriff Bailey would be aware of all firearm 15 discharges?</p> <p>16     A. If they are reported.</p> <p>17     Q. Okay. Indulge me one second. And a gun 18 discharge, does a gun discharge constitute the use 19 of force?</p> <p>20     A. Not necessarily.</p> <p>21     Q. Okay. Can you explain that? Why wouldn't 22 it?</p> <p>23     A. If you're at home playing with your 24 firearm and you shoot your television, that's not a 25 use of force.</p>	<p>Page 126</p> <p>1      Q. Okay. How do you describe the chain of 2 command at the time of the Michael Jenkins incident? 3 Who was number one, two, three and four in the chain 4 of command?</p> <p>5      A. Oh, number one's going to be the Sheriff. 6 Number two is going to be the Undersheriff. Number 7 three is going to be the --</p> <p>8      Q. You're talking about Paul Holly?</p> <p>9      A. There have been several undersheriffs 10 while I was there.</p> <p>11     Q. Okay. But at the time of Jenkins?</p> <p>12     A. Yep, yeah. Undersheriff Holly was not 13 there at that time. He was at the FBI National 14 Academy.</p> <p>15     Q. Who was the Undersheriff at the time of 16 the Jenkins incident?</p> <p>17     A. Paul Holly. But he was -- he was at a 18 school.</p> <p>19     Q. But he was still second in the chain of 20 command?</p> <p>21     A. Yes, sir.</p> <p>22     Q. Okay. Quick question. Who was the 23 Undersheriff prior to Holly?</p> <p>24     A. Oh geez. It would have been Randy, I 25 think.</p>
<p>1      Q. Well, I'm talking about in the line of 2 duty. Discharge of firearm in the line of duty. Is 3 that considered the use of force?</p> <p>4      A. It certainly should be.</p> <p>5      Q. Okay. And did Rankin County have in place 6 any policies or procedures that monitored the use of 7 -- I mean the discharge of firearms?</p> <p>8      A. You were supposed to report that, but if 9 it wasn't reported, you had no way of knowing. And 10 again, I don't know how you would know.</p> <p>11     Q. Okay. So that would be no?</p> <p>12     A. That would be an "I don't know."</p> <p>13     Q. Okay. All right. I need five minutes, 14 and then I'm going to finish up. Give me five 15 minutes. I'll come right back, we'll finish it up.</p> <p>16     THE REPORTER: Okay. We're off the 17 record. The time now is 1:04 p.m.</p> <p>18     (WHEREUPON, a recess was taken.)</p> <p>19     THE REPORTER: We're back on record. The 20 time now is 1:16 p.m.</p> <p>21     BY MR. SHABAZZ:</p> <p>22     Q. Okay. Mr. Godfrey, at the time of the 23 Michael Jenkins incident, you're familiar with the 24 term "chain of command"; correct?</p> <p>25     A. Yes, sir.</p>	<p>Page 127</p> <p>1      Q. Randy. What last name?</p> <p>2      A. You would ask. I'm drawing a blank loss 3 right quick. It will come to me.</p> <p>4      Q. How long did Randy serve, was Randy's 5 years of service?</p> <p>6      A. 18 months maybe, on and off.</p> <p>7      Q. One and a half. Do you know why he left?</p> <p>8      A. I think he just got tired of everything.</p> <p>9      He was -- this was a second career for him, just 10 like some of us. I think he --</p> <p>11     Q. What did he get -- what did he get tired 12 of?</p> <p>13     A. You'd have to ask him.</p> <p>14     Q. Well, you said you thought he got tired. 15 Where did you get that thought from?</p> <p>16     A. Well, just because when people retire, 17 it's when they get tired of doing what they're 18 doing.</p> <p>19     Q. I mean but are you aware of anything that 20 he would have been tired of specifically?</p> <p>21     A. The day-to-day operations of the Rankin 22 County Sheriff's Office, probably. It's a -- it's a 23 taxing job, especially Undersheriff. He handles 24 most of the purchasing and keeping up of equipment 25 and the hiring and the firing and all that kind of</p>

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1 stuff. So I'm sure he was pretty taxed.  
 2 Q. Okay. Now Randy served for 18 months.  
 3 Who was the Undersheriff before Randy?  
 4 A. Probably been McBroom, Kenton McBroom.  
 5 Q. Hold on a second. What was that name?  
 6 A. Ken McBroom.  
 7 Q. What, B-R like a broom?  
 8 A. M-C, capital B-R-O-O-M, yes sir.  
 9 Q. Ken McBroom. When did Ken McBroom serve  
 10 from?  
 11 A. A long time. He was Undersheriff when I  
 12 came there. Then he left, retired and came back on  
 13 a contract. So I can't -- I don't know the dates.  
 14 I just know he was in and out a lot.  
 15 Q. Is he still with Rankin County Sheriff's  
 16 Department right now?  
 17 A. I don't -- I don't know.  
 18 Q. Okay. Now before Mr. McBroom?  
 19 A. That would have been -- give me a second.  
 20 It will come to me. I'm going to look at my phone.  
 21 Can't look at my phone to pull up a personnel -- I  
 22 mean I don't have a personnel list. I just have it  
 23 in my phone. Raymond Duke, D-U-K-E.  
 24 Q. Raymond Duke.  
 25 A. Yes, sir.

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1 Q. Okay. Do you know when he began?  
 2 A. No, sir. And in fact he was after McBroom  
 3 and then McBroom came back. So there's a lot of  
 4 movement up in that office. I don't know dates.  
 5 Q. Okay. All right. Well, that's far enough  
 6 back for now. All right. Okay. At the time of the  
 7 Michael Jenkins incident, who was third in command?  
 8 A. Well, it wouldn't be a direct third. It  
 9 would be all your chief deputies would be under  
 10 that. And it would be -- it would be -- if you have  
 11 particular incident, it would be the Chief Deputy  
 12 who was in charge of whoever was involved in that  
 13 incident.  
 14 Q. Okay. How would you describe Brett  
 15 McAlpin? He was the Chief Investigative Officer,  
 16 right?  
 17 A. Right, yes.  
 18 Q. How do you describe him in the chain of  
 19 command?  
 20 A. If it was involved an investigator  
 21 investigation, I would assume he would be number  
 22 three.  
 23 Q. Okay. And that would be investigation  
 24 into use of force?  
 25 A. Yeah. Probably, yep.

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1 Q. Okay. And civil rights and violations  
 2 also?  
 3 A. You didn't break them down by violation.  
 4 You just whoever. If it was your people involved,  
 5 you were in the chain of command for that.  
 6 Q. Okay. But it's just -- it's adequate to  
 7 describe McAlpin as third in the chain of command?  
 8 A. For the -- the investigators. If it would  
 9 have been a patrol officer, it would have been the  
 10 Patrol Chief Deputy.  
 11 Q. Okay. Now let's go back to the Goon Squad  
 12 coin.  
 13 A. Okay.  
 14 Q. Now did you ever discuss the existence of  
 15 the Goon Squad coin with Brian Bailey?  
 16 MR. DARE: Asked and answered.  
 17 THE DEONENT: I've answered that once.  
 18 No.  
 19 BY MR. SHABAZZ:  
 20 Q. Okay. So who did you discuss the coin  
 21 with?  
 22 A. Really wasn't a topic of discussion.  
 23 Somebody would say "Hey, have you seen their coin"  
 24 and somebody'd say "Yeah, I've seen it. Yeah."  
 25 Like it wasn't -- it wasn't a big deal.

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1 Q. Okay. I mean was it -- was it limited to  
 2 the night shift, or was it -- was Goon Squad  
 3 applicable to other shifts?  
 4 A. No. It was that -- the coin was made for  
 5 McAlpin's shift.  
 6 MR. DARE: Middleton.  
 7 BY MR. SHABAZZ:  
 8 Q. Now how did -- well, you talked about  
 9 Middleton, you mean?  
 10 A. I'm sorry.  
 11 Q. Middleton.  
 12 A. Middleton, yes. I'm sorry.  
 13 Q. How did you -- how did you know it was  
 14 limited to Middleton's shift?  
 15 A. He said "Our shift had a coin made."  
 16 Q. That's what Middleton said to you?  
 17 A. Uh-huh.  
 18 MR. DARE: Yes?  
 19 MR. WALKER: Yes.  
 20 MR. SHABAZZ: Okay.  
 21 THE DEONENT: Yes. I'm sorry.  
 22 BY MR. SHABAZZ:  
 23 Q. Okay. Now did you ask anybody else about  
 24 it?  
 25 A. No.

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1	Q. Okay. But you said that you -- I think	1	Q. What did the "goon" mean?
2	you said earlier that the coin was being passed out	2	A. It's just his squad. It was a team-
3	in the office?	3	building thing for them.
4	A. I just knew several people had it. I	4	Q. Are you familiar with Lloyd Goon?
5	didn't mean they -- somebody was standing there on	5	A. With who?
6	the corner passing them out one by one, no. They're	6	MR. WALKER: Lloyd Jones.
7	generally traded. Coins are traded.	7	THE DEPONENT: Lloyd Jones. I never met
8	Q. Tell me about that.	8	Mr. Jones. I know who he is.
9	A. I said coins are generally traded, any	9	BY MR. SHABAZZ:
10	kind of coin. We have SRT coins, the Sheriff's	10	Q. Do you he's -- have you heard -- do you
11	Office had its own coin, and you would go to a	11	know that he's known as Lloyd Goon Jones?
12	function or go to a training event and you would	12	A. I did not at that time. I've heard since
13	trade coins with other people.	13	then that that's -- that he was. I have no idea if
14	Q. Okay. But who did you discuss the Goon	14	that's where Middleton got the idea from.
15	Squad coin with?	15	Q. Okay. Now goon. Now you say it's just
16	A. Nobody in particular.	16	the name of Middleton's shift, right?
17	Q. Well, how did you know it was being passed	17	A. At that time, yes sir.
18	around the office?	18	Q. Okay. Now what does -- when you heard the
19	A. Because I saw people with the coin.	19	name "goon," what did goon mean to you, though?
20	Q. Who?	20	A. Nothing in particular. The figures were
21	A. I don't remember. It was not a big deal,	21	just looked like little gangsters. They have hats
22	sir.	22	on and suits.
23	Q. The existence of the Goon Squad coin was	23	Q. They look like -- they look like
24	not a big deal to the department?	24	gangsters?
25	A. No. There are coins all around.	25	A. They look like a 30's guy, fedora hat,
Page 135		Page 137	
1	Q. Okay. Now what does -- what does "goon"	1	little suit and they had their hands in their
2	mean? Do you know what goon means, what the goon in	2	pockets, as I remember.
3	the Goon Squad means? Do you know?	3	Q. Now did that strike you at all that
4	A. Yeah. If you --	4	Sheriff deputies were calling themselves goons?
5	MR. DARE: You don't have to speculate.	5	A. Not particularly. I've seen -- I've seen
6	If you know, you can --	6	challenge coins with skulls and crossbones and
7	MR. SHABAZZ: You're coaching him. How	7	everything else on them. I mean it's just what you
8	are you going to coach this man? Don't coach this	8	picked.
9	man.	9	Q. Does the department allow deputies to use
10	THE DEPONENT: Sir, I'm 71 years old. I'm	10	other insignia besides approved department insignia?
11	not being coached.	11	A. After that happened, I think they issued a
12	MR. WALKER: He can -- he can answer based	12	prohibition, and there may have been one before
13	on his experience at the department.	13	that. I don't remember.
14	MR. DARE: If you know. If you know,	14	Q. Okay. Tell me about the one before that.
15	answer.	15	A. We had SRT coins made that had the
16	MR. SHABAZZ: Let him just man answer.	16	Sheriff's Office badge on one side and the SRT patch
17	You can't coach him.	17	on the other side.
18	THE DEPONENT: I'll answer the question if	18	Q. Okay. So what -- tell me about the
19	you'll allow me to, sir. In general -- in general	19	prohibition? What happened with the prohibition?
20	you would think --	20	A. That you could not use a Sheriff's Office
21	MR. SHABAZZ: What did the Goon Squad --	21	patch without our insignia without approval from the
22	what did the goon in this Goon Squad coin mean?	22	Sheriff.
23	What did goon mean?	23	Q. This was ahead of the Jenkins incident?
24	MR. DARE: Object to form.	24	A. This was -- I think this was after.
25	BY MR. SHABAZZ:	25	Q. Okay, okay.

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<p>1 A. Because I don't think it had really 2 occurred before. I mean as far as being 3 controversial or anything.</p> <p>4 Q. Yeah. But beforehand. So you said there 5 was a prohibition beforehand on --</p> <p>6 A. I'm not sure. I'm not sure when the 7 prohibition was issued. I just know that they came 8 out one day. I think it came from Holly, that you 9 cannot use the Sheriff's Office badge or patch 10 unless approved by management.</p> <p>11 Q. Okay. Now how did you -- now how did you 12 know that the Goon Squad was just limited to 13 Middleton's shift?</p> <p>14 A. Because they said this was our shift.</p> <p>15 Q. Okay. Who's the "they"?</p> <p>16 A. Middleton. I've answered this several 17 times.</p> <p>18 Q. You said "they." Middleton's a single 19 individual. You said "they." Who's the they?</p> <p>20 A. Middleton.</p> <p>21 Q. Yeah. But did you discuss the Goon Squad 22 coin with anyone other than Middleton?</p> <p>23 A. It was not a topic of discussion.</p> <p>24 Somebody said "Hey, have you seen the coin 25 Middleton's team, our squad got?" Yeah. I said</p>	<p>Page 138</p> <p>1 MR. SHABAZZ: This is my deposition, sir. 2 MR. DARE: Sure. Ask a question. 3 BY MR. SHABAZZ:</p> <p>4 Q. Okay. Now who -- in terms of the 5 discharge of weapons, was there a person in charge 6 of -- of checking the deputy's weapons and their 7 bullets and not, checking their firearms and their 8 amount of ammunition before they went out on patrol?</p> <p>9 A. No.</p> <p>10 Q. Okay. And was there a procedure when they 11 returned, to check their weapons to see whether or 12 not their weapons had been discharged?</p> <p>13 A. No.</p> <p>14 Q. Okay. Okay. So your -- the system in 15 Rankin County was just based on trust?</p> <p>16 A. In 48 years of --</p> <p>17 Q. No one --</p> <p>18 A. In 48 years of law enforcement, I know of 19 no agency that checks any officer's weapon before 20 the shift and after the shift personally. I have no 21 knowledge of that. Never heard of it.</p> <p>22 Q. And if it existed, would you be surprised?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Okay. So an officer in Rankin 25 County can discharge his weapon any number of times,</p>
<p>1 yeah, I got one. He gave me one, and that was it.</p> <p>2 Q. Okay. And so -- I mean how did you know 3 it was just limited to the night shift? Did you 4 just draw that conclusion or did somebody spell that 5 out to me?</p> <p>6 A. Middleton told me "Here's our coin."</p> <p>7 Q. Okay. So what are you saying? You just 8 made an assumption that it was just on his shift?</p> <p>9 A. Yeah. I would -- that would be a good --</p> <p>10 that would be a good assumption that I assumed, yes 11 sir.</p> <p>12 Q. You didn't follow up?</p> <p>13 A. What was there to follow up on?</p> <p>14 Q. Follow up on the existence of a sub- 15 organization in the department that soon thereafter 16 went on to commit heinous crimes.</p> <p>17 MR. DARE: Object to -- was that a 18 question? Can you ask the question again?</p> <p>19 MR. SHABAZZ: I submitted the question. I 20 asked him.</p> <p>21 MR. DARE: No. You made a statement.</p> <p>22 MR. SHABAZZ: He said "Follow up as to 23 what?" I answered it for him.</p> <p>24 MR. DARE: Okay. So do you have a 25 question on the table?</p>	<p>Page 139</p> <p>1 and when he returns no one checks; is that correct?</p> <p>2 A. When I was there, no you didn't check 3 every night. No, or every morning or whenever they 4 came in. No.</p> <p>5 Q. I mean did that policy change?</p> <p>6 A. I have no idea.</p> <p>7 Q. Did it change while you were there?</p> <p>8 A. No. There never was a policy.</p> <p>9 Q. Okay. So as of this point, the officer 10 can -- can go in the field and fire off 12 rounds, 11 and no system is in place to check whether or not 12 that officer has discharged rounds?</p> <p>13 A. I think I've --</p> <p>14 MR. DARE: Is there a question?</p> <p>15 BY MR. SHABAZZ:</p> <p>16 Q. Is that the system in Rankin County?</p> <p>17 A. I think I've answered that. I know of no 18 agency that does that.</p> <p>19 Q. I'm talking about this one. Forget the 20 other ones. This one.</p> <p>21 A. Well, I think this one would be included 22 in "no agency."</p> <p>23 Q. I'm just talking about this one, because 24 we're not giving opinions on other ones.</p> <p>25 A. No.</p>

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<p>1       Q. We're talking about Rankin. There is no 2 system in place?</p> <p>3       A. No.</p> <p>4       THE REPORTER: I need to remind you two to 5 please speak one at a time, so I can record more 6 clearly.</p> <p>7       MR. SHABAZZ: Okay. All right. All 8 right. I have no further questions.</p> <p>9       THE DEPONENT: Excellent.</p> <p>10 EXAMINATION</p> <p>11 BY MR. DARE:</p> <p>12       Q. I have just a handful of follow-ups. 13 Earlier in your deposition, you made reference to a 14 DT training. What does the DT stand for?</p> <p>15       A. Defensive tactics.</p> <p>16       Q. And what generally is a defensive tactics 17 training?</p> <p>18       A. It's depending on what style your 19 particular officer chooses, it could be a Gracie 20 jujitsu style, it could be just some standard 21 handcuffing techniques. Generally, what it starts 22 as, the basic handcuffing techniques. It will 23 expand to taser use. It could expand to use of 24 baton, less than lethal force, grappling techniques. 25 It could be one of a number of different things.</p>	<p>Page 142</p> <p>1 into future training or seek proper training out.</p> <p>2       Q. I think you testified to this, and I want 3 to make sure. Now OIS is what?</p> <p>4       A. Officer-involved shooting.</p> <p>5       Q. And during your time at the Rankin County 6 Sheriff's Department, how were OISs investigated, if 7 the OIS occurred -- if a deputy with the Rankin 8 County Sheriff's Department was involved in the OIS?</p> <p>9       A. When I first got there, I remember the 10 first one or two I think were probably investigated 11 internally. And after that, they started assigning 12 them to MBI. And I -- I can't give you a specific 13 date or time that MBI started doing.</p> <p>14       There were -- when I first got there, they 15 were very rare. They were very rare when I first 16 started there, because I remember the first one 17 after I started there. It had been the first one 18 they'd had in years.</p> <p>19       Q. To your knowledge, was it a requirement 20 that MBI investigate OISs for Sheriff's Departments?</p> <p>21       A. Not to my knowledge. I don't know.</p> <p>22       MR. DARE: Tender the witness back to you, 23 counsel.</p> <p>24 FURTHER EXAMINATION</p> <p>25 BY MR. SHABAZZ:</p>
<p>1       Q. Based on your knowledge of training 2 requirements on or prior to January of 2023, what 3 did the state require of Sheriff's Department 4 deputies as far as annual training, the state of 5 Mississippi?</p> <p>6       A. None.</p> <p>7       Q. You were also asked about investigations 8 into the Damien Cameron incident. Did I understand 9 you correctly that you don't recall investigations 10 by the name of the individual, is that right?</p> <p>11       A. Now is that the investigation with Elward?</p> <p>12       Q. So I'm going to represent to you that 13 Damien Cameron was the individual who was 14 unconscious in the back of Hunter Elward's vehicle.</p> <p>15       A. Yeah. I know what you're talking about.</p> <p>16       Q. And later died in a -- in a hospital.</p> <p>17       A. Right.</p> <p>18       Q. Did you ever interview Hunter Elward 19 following the Damien Cameron incident?</p> <p>20       A. Officially, no.</p> <p>21       Q. Did you speak with him about the incident?</p> <p>22       A. Yes. I asked him what happened one time. 23 In general, any time somebody was involved in any 24 kind of altercation, I would ask them what happened 25 just for knowledge. Perhaps there's a chance to add</p>	<p>Page 143</p> <p>1       Q. Okay. So you were not the Internal 2 Affairs officer for Rankin County at the -- at any 3 time, Internal Affairs officer for Rankin County at 4 any time?</p> <p>5       A. We didn't have Internal Affairs officer 6 when I was there.</p> <p>7       Q. Oh. And you weren't the person 8 responsible for investigating allegations of -- of 9 violations of department policy by the deputies in 10 Rankin, were you?</p> <p>11       A. Not unless the Sheriff asked me to look 12 into a particular matter.</p> <p>13       Q. Okay. And that occurred rarely? I mean 14 just on sporadic occasions?</p> <p>15       A. It was pretty rare, yes sir.</p> <p>16       Q. Okay. Did you -- just on investigations, 17 did you investigate the use of force at the 18 Sheriff's Office? Did you investigate the use of 19 force by a gentleman by the name of Christopher 20 Mack, who in 2021 claims that he was beaten in the 21 jail by Rankin deputies? Early and either between 22 January and May of 2021? Christopher Mack claimed 23 he was beaten by a deputy at Rankin Jail. Are you 24 familiar with that?</p> <p>25       MR. DARE: I'm going to object to the --</p>

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1	at least to the extent it's beyond the scope of	1 CERTIFICATE
2	cross. But you can answer.	2
3	THE DEPONENT: Not to my knowledge. I	3 I, Nicole Smith, do hereby certify that I
4	don't really remember.	4 reported all proceedings adduced in the foregoing
5	BY MR. SHABAZZ:	5 matter and that the foregoing transcript pages
6	Q. Have you ever investigated any matter	6 constitutes a full, true and accurate record of said
7	involving a gentleman by the name of Christopher	7 proceedings to the best of my ability.
8	Mack?	8
9	A. Doesn't ring a bell.	9 I further certify that I am neither
10	MR. SHABAZZ: All right. Thank you so	10 related to counsel or any party to the proceedings
11	much.	11 nor have any interest in the outcome of the
12	THE REPORTER: All right.	12 proceedings.
13	MR. SHABAZZ: I'm done.	13
14	THE REPORTER: Okay. Before we go off	14 IN WITNESS HEREOF, I have hereunto set my
15	record, counsel would you like to order an original,	15 hand this 15th day of November, 2024.
16	Mr. Shabazz, of the transcript?	16
17	MR. SHABAZZ: Yes, ma'am, I would. Well,	17
18	I'll take it electronically right now, yes. I'll	18
19	take it electronically.	19
20	THE REPORTER: Yeah, that's perfect.	20 Nicole Smith
21	Okay.	21
22	MR. SHABAZZ: That's all I want.	22
23	MR. DARE: And we will read and sign. You	23
24	can send it -- you can send the copy just to me, and	24
25	I'll get the read and sign, via email. Yes, over to	25
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1	--	1 CORRECTION SHEET
2	MR. WALKER: All right. Thank you.	2 Deposition of: Steven N. Godfrey Date: 11/11/24
3	THE REPORTER: Anything else? Off record.	3 Regarding: Jenkins vs. Rankin County
4	The time now is 1:38 p.m.	4 Reporter: Smith/Seaman/Holmes
5	(WHEREUPON, the deposition of STEVEN N.	5
6	GODFREY was concluded at 1:38 p.m.)	6 Please make all corrections, changes or
7		7 clarifications to your testimony on this sheet,
8		8 showing page and line number.
9		9 If there are no changes, write "none" across the
10		10 page. Sign this sheet and the line provided.
11		11 Page Line Reason for Change
12		12 _____
13		13 _____
14		14 _____
15		15 _____
16		16 _____
17		17 _____
18		18 _____
19		19 _____
20		20 _____
21		21 _____
22		22 _____
23		23 _____
24		24 Signature: _____
25		25 Steven N. Godfrey

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1 Date: 11/11/2024	Assignment #: 79776	Page 150
2 Deponent: Steven N. Godfrey		
3 Case: MICHAEL COREY JENKINS vs . RANKIN COUNTY		
4		
5 ATTORNEY - TRANSCRIPT ENCLOSED:		
6 signature of your client is required. Please have your client		
7 make any corrections necessary. Sign the Correction Sheet		
8 where indicated. Forward a COPY of the executed Correction		
9 Sheet directly to the attorney(s) listed below. (The Address(es)		
10 can be found on the Appearance page of the deposition.) Also,		
11 send a COPY of the executed Correction Sheet to our corporation.		
12		
13		
14		
15		
16		
17		
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19		
20 C C:Naegeli Deposition and Trial		
21		
22		
23		
24		
25		

1	Page 151
2	DECLARATION
3	Deposition of: Steven N. Godfrey Date: 11/11/2024
4	Regarding: MICHAEL COREY JENKINS vs . RANKIN COUNTY
5	Reporter: Nicole Smith
6	_____
7	I declare under penalty of perjury the following to be
8	true:
9	
10	I have read my deposition and the same is true and
11	accurate save and except for any corrections as made
12	by me on the Correction Sheet herein.
13	
14	Signed at _____, _____
15	on the _____ day of _____, 20 ____.
16	
17	
18	
19	
20	
21	
22	
23	
24	Signature: _____
25	Steven N. Godfrey

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